

Honorable John C. Coughenour  
Hearing Date: 9/6/2019  
Without Oral Argument

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

DISCOVERY PARK COMMUNITY  
ALLIANCE, a Washington non-profit  
corporation; and ELIZABETH A. CAMPBELL,

Petitioners/Plaintiffs,

v.

CITY OF SEATTLE,

Respondent/Defendant.

No. 2:19-cv-01105-JCC

MOTION TO WITHDRAW AS  
COUNSEL FOR  
PETITIONERS/PLAINTIFFS  
WITHOUT SUBSTITUTION

COMES NOW Daniel J. Frohlich and Thomas Dickson of Dickson Frohlich, PS and hereby moves this Court for an Order allowing counsel for the Petitioners/Plaintiffs, DISCOVERY PARK COMMUNITY ALLIANCE, a Washington non-profit corporation; and ELIZABETH A. CAMPBELL, to withdraw (collectively "Petitioners").

Daniel J. Frohlich and Thomas Dickson of Dickson Frohlich currently are listed as counsel for Petitioners and hereby request withdrawal and in support thereof state:

Petitioners have terminated the services of Dickson Frohlich, PS and have so informed this Court in Docket #10 and #11. This office is unaware of any substituting counsel for the Petitioners.

Petitioner Discovery Park Community Alliance, a Washington non-profit corporation, has been advised of the following pursuant to LCR 83.2(b)(4):

**(4) A business entity, except a sole proprietorship, must be represented by counsel. If the attorney for a business entity, except a sole proprietorship, is seeking to withdraw, the attorney shall certify to the court that he or she has advised the business entity that it is required by law to be represented by an attorney admitted to practice before this court and that failure to obtain a replacement attorney by the date the withdrawal is effective may result in the dismissal of the business entity's claims for failure to prosecute and/or entry of default against the business entity as to any claims of other parties.**

Counsel for Petitioners requests to withdraw and there will be no material adverse impact on the interests of the Petitioners.

The Plaintiffs' last known address is as follows:

Discovery Park Community Alliance  
4027 21<sup>st</sup> Avenue West, #206  
Seattle, WA 98199  
Phone: (206) 283-9127

Elizabeth A. Campbell, Pro Se  
4027 21<sup>st</sup> Avenue West, #206  
Seattle, WA 98199  
Phone: (206) 283-9127

Attached to this Motion is a Certificate of Service certifying that this Motion for Order to Withdraw was served on the clients (Plaintiffs) and opposing counsel. Accordingly, Daniel Frohlich and Thomas Dickson of Dickson Frohlich, PS, respectfully requests that this Motion be granted.

This Motion is brought in accordance with LCR 83.2(b)(1).

DATED this 29<sup>th</sup> day of August 2019.

DICKSON FROHLICH, P.S.



DANIEL J. FROHLICH, WSBA No. 31437  
THOMAS L. DICKSON, WSBA No. 11802  
Withdrawing Attorneys for  
Petitioners/Plaintiffs

CERTIFICATE OF SERVICE

Under penalty of perjury under the laws of the State of Washington, I declare that on the date below, I cause to be delivered a copy of the foregoing Pleading to the following by the method described below:

PARTY/COUNSEL	DELIVERY INSTRUCTIONS
Roger Wynne Patrick Downs Assistant City Attorney Land Use Section Director Seattle City Attorney's Office 701 Fifth Avenue, Suite 2050 Seattle, WA 98104-7095 Phone: 206-233-2177 FAX: 206-684-8284 <a href="mailto:roger.wynne@seattle.gov">roger.wynne@seattle.gov</a> <i>Lead Attorney for Defendants</i>	<input type="checkbox"/> U.S. MAIL <input type="checkbox"/> LEGAL MESSENGER <input type="checkbox"/> EMAIL <input type="checkbox"/> EXPRESS DELIVERY <input type="checkbox"/> FACSIMILE <input checked="" type="checkbox"/> CM/ECF
Discovery Park Community Alliance 4027 21 <sup>st</sup> Avenue West, #206 Seattle, WA 98199 Phone: (206) 283-9127	Email and US First Class Mail Postage Prepaid & Certified Return Receipt Requested 70180360000018689041
Elizabeth A. Campbell, Pro Se 4027 21 <sup>st</sup> Avenue West, #206 Seattle, WA 98199 Phone: (206) 283-9127	Email and US First Class Mail Postage Prepaid & Certified Return Receipt Requested 70180360000018689058

DATED August 29<sup>th</sup> 2019, signed at Tacoma, Washington.

Kimberly J. Lampman, WSBA No. 9100472